

23443 S. Hays Road
Manteca, CA 95337
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Steve Ritchie, Acting Director
CALFED Bay Delta Program
1416 9th St., Suite 1155
Sacramento, CA 95814

Secretary Mary Nichols
The Resources Agency of California
Suite 134, Resources Building
1416 Ninth St.
Sacramento, CA 95814

Dear Steve and Secretary Nichols:

The South Delta Water Agency joins me in applauding the recent CalFed decision to have all proposals for land acquisitions in the Delta scrutinized by the Delta Protection Commission prior to adoption. We are also pleased that CalFed has agreed to a full discussion of the design of the through Delta conveyance proposal, and of the long-term consequence of continuing groundwater overdraft. We believe, however, that the same reasons that led to these decisions should lead also to some further decisions on process which have been discussed in both the BDAC and the Policy Group, but not clearly adopted.

Land and water acquisitions in the Central Valley have in the past often been made either without an environmental impact study or on the basis of FONSI's prepared by, or under the control of parties with conflicts of interest and with little or no consideration of cumulative and long term impacts. As discussed at the November 17 Policy Group meeting, the process prior to approval of land and water acquisitions in the watershed of the Delta should include a review by independent technical experts from relevant fields of technical expertise. These experts would be asked to examine third party, redirected, cumulative and long term impacts of proposals before they are adopted.

A similar review should be required for proposals to manage water within the Delta. In this case the technical review should also evaluate the combined technical viability of all interrelated proposals, their effect on both in-Delta and export water quality and availability, the level of confidence that the effect on aquatic environment would be as anticipated, and whether the proposal is the most effective way to achieve its objectives.

Also, in regard to water management within the Delta CalFed should commit to seeking and heeding the expertise and interests of in-Delta users of water for agriculture, recreation, and other purposes. This in-Delta expertise should be involved in developing proposals, not just reacting to proposals. These proposals specifically include through-Delta water conveyance and North and South Delta water management proposals. Where this has not been done in the past CalFed should commit to reconsider proposals that have already been adopted as soon as reanalyses with local expertise can be accomplished, and before the ROD.

In summary, we ask that these procedures be clearly adopted by CalFed:

- There shall be review by independent technical experts from relevant fields of technical expertise of water and land acquisition proposals throughout the Delta's watershed, and similar review of in-Delta water management proposals. This review is to include determination of third party impacts, redirected impacts, and long term cumulative impacts and technical viability.
- Participation of in-Delta expertise and interests shall be sought in developing proposals for in-Delta water management.
- CalFed shall commit to reconsider proposals that have been adopted for in-Delta water management where those proposals have been developed without local expertise and without the technical analyses called for herein.
- CalFed commits to examine and discuss the long term consequences of continuing reliance on groundwater overdraft, and examination of the related consequence of continuing the accumulation of imported salt in the San Joaquin Valley.

We believe that a clear commitment to these procedures would increase the assurance of a viable CalFed Program, and would enhance public confidence in the ultimate Program.

Sincerely,



Alex Hildebrand

cc Central Delta Water Agency
North Delta Water Agency
Delta Protection Commission
San Joaquin County
Congressman Richard Pombo
Assemblyman Michael Machado
San Joaquin County Farm Bureau